

EXHIBIT 25

1
2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF NEW YORK

4 -----X
5 SHORELINE AVIATION, INC.,
6 Plaintiff,

7 -against-

Case No.
2:20-cv02161
JMA-SIL

8
9 CYNTHIA L. HERBST, SOUND AIRCRAFT
10 FLIGHT ENTERPRISES, INC., RYAN A.
11 PILLA, BLADE URBAN AIR MOBILITY,
12 INC., a/k/a FLY BLADE, INC., MELISSA
13 TOMKIEL, and ROBERT S. WIESENTHAL,
14

15 Defendants.
16
17 -----X
18

19 June 8, 2022
20 10:03 a.m.
21 Virtual Zoom
22

23 DEPOSITION of RYAN A. PILLA, a
24 Defendant herein, taken by the Plaintiff,
25 pursuant to Rule 30(B)(6) of the Federal Rules
of Civil Procedure, and Notice, held at the
above-mentioned time and place, before Susan
Crane, a Notary Public of the State of New York.

1 R. Pilla

2 today's deposition?

3 A I read over the Interrogatories
4 and the Complaint. That was it.

5 Q I'm not interested in knowing
6 about the substance of any communications you
7 may have had with Mr. Skibell, but without
8 revealing that, did you speak to anyone else
9 about today's deposition?

10 A No.

11 Q Did you speak to Ms. Herbst about
12 today's deposition?

13 A Yes. The only two people I have
14 spoken to is Mr. Skibell and Cindy. That's it.

15 Q When did you speak to Ms. Herbst?

16 A I live with Ms. Herbst. She is my
17 significant other.

18 Q When did you speak to her about
19 today's deposition?

20 A I saw her this morning. I saw her
21 last night. Like I said, I see her every day.

22 Q I'm only asking you now about the
23 deposition. What did you and Ms. Herbst discuss
24 about today's deposition?

25 A Not too much of anything. I mean

1 R. Pilla

2 again, I read over the Interrogatories and I
3 read over the Complaint.

4 Q Do you know that she previously
5 had her deposition taken in this case?

6 A Yes, I do.

7 Q Were you present for that?

8 A No, I was not.

9 Q Have you seen a recording of that?

10 A No, I have not.

11 Q Have you read a transcript of it?

12 A No, I have not.

13 Q Did you know that Andrea
14 Collingwood had her deposition taken in this
15 case?

16 A Yes, I do.

17 Q Were you present for that?

18 A No, I was not.

19 Q Have you seen a recording or read
20 a transcript of that deposition?

21 A I have not.

22 Q Can you briefly describe your
23 educational background?

24 A Sure. I graduated cum laude from
25 Rollins College in Winter Park, Florida. I was

1 R. Pilla

2 a business major.

3 Q What year did you graduate?

4 A '94.

5 Q Any further education or
6 certificates or training beyond your college
7 education?

8 A Well, I have ASC certifications.
9 I'm a mechanic. I'm a -- antique car, classic
10 car, BMW Porsche, Mercedes. I have world
11 records. I have quite a resume in the
12 mechanical field.

13 Q Just briefly what is your
14 educational component of that, if any? Do you
15 have any certificates or training that you
16 completed in that field?

17 A I own a business called The Car
18 Doctor and everyone calls me the doctor so I
19 consider myself the doctor of cars.

20 Q Can you describe for us briefly
21 what that business is and what it does?

22 A It's a repair business. We do
23 antique car work, classic car work, high
24 performance work. Like I said, my expertise is
25 in full foreign and domestic BMWs, Porsche,

1 R. Pilla

2 Mercedes, Ferraris, Bentleys. I'm the doctor,
3 mad scientist of cars.

4 Q When did you start that business?

5 A During college. I have been doing
6 it ever since.

7 Q Did you start it in Florida?

8 A I started it -- actually my father
9 was very involved in the automotive business so
10 I was -- whatever I could work on -- he built
11 cars -- at the time to make money, I would.
12 Wherever I was at the present time, but I have
13 been working on cars since I was five years
14 old.

15 Q When did you start The Car Doctor?

16 A The Car Doctor out here in the
17 Hamptons was started, I don't know the exact
18 business certificate date, but sometime in the
19 late '90s. I think probably certificatewise
20 and, you know, it was probably in the early
21 2000s.

22 Q Where is that business located?

23 A In Water Mill.

24 Q Any other locations other than
25 Water Mill?

1 R. Pilla

2 A No.

3 Q Has it ever been located in any
4 other places other than Water Mill?

5 A It was located in Amagansett at
6 the time. At the time The Car Doctor existed in
7 the Hamptons half of it was in Amagansett and
8 half of it was in Water Mill.

9 Q Was it in Amagansett first?

10 A Yes.

11 Q Approximately if you recall, when
12 did you move it to Water Mill?

13 A I don't totally recall that.
14 Maybe -- I'm not sure, 2007 or 2008. Somewhere
15 around there. I'm not really sure.

16 Q Are you the sole owner of The Car
17 Doctor?

18 A I am.

19 Q Have you always been?

20 A I am, yes. I have.

21 Q You don't have any partners or
22 owners of the The Car Doctor at present?

23 A No.

24 Q And never have there been before?

25 A No.

1 R. Pilla

2 A Oh, boy, what was his name? You
3 would know him better than me. He was a good
4 client of yours. He had a gray truck that we
5 did for him. I'm not really sure what his name
6 was. I'm not sure what it was.

7 Q Was that Michael Gaynor?

8 A Yes.

9 Q Did Michael Gaynor file a lawsuit
10 against The Car Doctor?

11 A I don't know if it was a lawsuit.
12 I know there was paperwork saying he wasn't
13 happy with this, that or the other thing, and he
14 didn't want to pay the amount that was owed.
15 Then you and I believe the attorney at the time
16 was -- you can help me out with that too.

17 Q Brian Doyle?

18 A Brian Doyle. Then we came to an
19 agreement and he paid half of what was owed and
20 it was settled.

21 Q Other than Mr. Gaynor, are you
22 aware of anyone else filing a lawsuit --

23 A No.

24 Q -- in court against The Car
25 Doctor?

1 R. Pilla

2 A No, not that I know of.

3 Q Has The Car Doctor filed a lawsuit
4 towards any other person or entity?

5 A Not that I recall.

6 Q I think you testified earlier that
7 this is the first time that you have ever had
8 your deposition taken?

9 A I believe so, yes.

10 Q Have you ever given any testimony
11 at any sort of proceeding where you were being
12 questioned with a court reporter?

13 A Not that I recall.

14 Q What is your relationship with
15 Ms. Herbst?

16 A She is my girlfriend, my
17 significant other, the current love of my life.
18 This is the last one. I finally found it.

19 Q How long has Ms. Herbst been your
20 girlfriend?

21 A Approximately 10 years.

22 Q Do you also have a business
23 relationship with Ms. Herbst?

24 A No, I don't.

25 Q Have you ever had a business

1 R. Pilla

2 relationship with Ms. Herbst?

3 A No.

4 Q Do you own any other businesses
5 other than The Car Doctor?

6 A No, I don't.

7 Q In the past have you owned any
8 businesses other than The Car Doctor?

9 A No, I haven't.

10 Q Any ownership interest in
11 businesses other than The Car Doctor?

12 A All in The Car Doctor. It's been
13 my only business, my pride and joy from day one.
14 I started it from nothing and made quite a
15 success out of it from who we are from a Car
16 Doctor standpoint.

17 Q Great. Does Ms. Herbst have any
18 involvement with The Car Doctor?

19 A No.

20 Q Has she ever had any involvement
21 with The Car Doctor?

22 A No.

23 Q Does she have an ownership
24 interest in The Car Doctor?

25 A No.

1 R. Pilla

2 Q Has Ms. Herbst ever had an
3 ownership interest in The Car Doctor?

4 A Never.

5 Q What does Ms. Herbst do for a
6 living right now?

7 THE WITNESS: My screen
8 just went blank. Can you repeat
9 the question?

10 MR. KRIEGSMAN: The Zoom
11 format is unusual so let us know
12 at any time it changes.

13 Q What does Ms. Herbst do for a
14 living right now?

15 A She sells aviation charters.

16 MR. SKIBELL: I believe
17 your Outlook is open, Alex.

18 Q You said Ms. Herbst sells aviation
19 charters; does she do that through an entity?

20 MR. SKIBELL: Objection.
21 You can answer.

22 A She does that through her business
23 at SAFE.

24 Q Is Ms. Herbst the owner of SAFE?

25 A Yes, she is.

1 R. Pilla

2 Q Sole owner?

3 A As far as I know, yes.

4 Q As far as you know, how long has
5 she been the owner of SAFE?

6 A I wouldn't know that. As long as
7 I have known her.

8 Q Are you familiar with Sound
9 Aircraft Services?

10 A Yes.

11 Q What is your understanding of what
12 Sound Aircraft Services is?

13 A All I know is when I met Cindy,
14 she was the brain child behind everything. And
15 there was I believe two parts of the business,
16 one was charters and one was fuel. I think
17 Sound Aircraft Services was the fuel and ground
18 services and then SAFE was the charter component
19 of her company.

20 Q Do you have any ownership interest
21 in SAFE?

22 A No.

23 Q Do you have any involvement in
24 SAFE?

25 A No, besides being Cindy's

1 R. Pilla

2 girlfriend -- boyfriend, that's it.

3 Q Have you ever had an ownership
4 interest in SAFE?

5 A No.

6 Q Have you ever had any involvement
7 in SAFE?

8 A No.

9 Q Did you ever have any ownership
10 interest in Sound Aircraft Services or any other
11 entity that Ms. Herbst was involved in?

12 A Never.

13 Q Did you ever have any involvement
14 in Sound Aircraft Services or any other business
15 entity that Ms. Herbst was involved in?

16 A No.

17 Q I think you testified earlier you
18 understand we are here today in connection with
19 a lawsuit?

20 A Yes.

21 Q What is your understanding of what
22 this lawsuit is about?

23 MR. SKIBELL: Objection to
24 form. You can answer if you
25 understand the question.

1 R. Pilla

2 A What do I -- repeat it again,
3 Mr. Kriegsman.

4 Q Sure. What is your understanding
5 of what this lawsuit is about?

6 A This lawsuit as far as I know
7 is -- again, I hope I'm not speaking out of turn
8 -- very frivolous in my opinion. With that
9 said, this was about someone stating that
10 Cindy's customers were someone else's, which
11 they are not.

12 Q What do you mean by that, "Cindy's
13 customers"?

14 MR. SKIBELL: Objection.
15 You can answer if you understand
16 the question.

17 MR. KRIEGSMAN: Just to be
18 clear, Mr. Pilla, I'm going to ask
19 you some questions and Mr. Skibell
20 may interpose objections. Unless
21 he instructs you not to answer,
22 you just answer the question.

23 MR. SKIBELL: I instruct
24 you not to answer about any
25 communications you have had with

1 R. Pilla

2 multiple friends and acquaintances at the
3 airport so this is something that I just
4 observed. Obviously everyone observed it.
5 Everyone knows Cindy. Cindy was the East
6 Hampton Airport. Cindy has been there forever.
7 She started everything.

8 Q You came to learn that by being a
9 pilot and customer and passenger at the East
10 Hampton Airport; is that fair to say?

11 A Yes. She actually -- before we
12 became in a relationship she actually way back
13 in the day used to charter -- I used to charter
14 planes from her. At that point I basically
15 said, Well, why don't I learn how to fly. Then
16 I became I'm part of East Hampton Airport and a
17 person around the airport.

18 Q Any other ways that you came to
19 learn about SAFE or Cindy's business or
20 operations at the East Hampton Airport?

21 A No.

22 Q I understand that you, Ryan Pilla,
23 are named personally as a defendant in this
24 case?

25 A Yes.

1 R. Pilla

2 Q What is your understanding of what
3 the claims are against you?

4 A I don't have too much
5 understanding. Like I said, I think this is a
6 frivolous component of that. Conversations with
7 my girlfriend facilitate that I did something
8 wrong. Again, that's just a simple conversation
9 and advice that she asked me for, and I don't
10 know why someone that brought coffee to the
11 table is part of this case.

12 Q Did you do anything else other
13 than bring coffee to the table?

14 A I had simple conversations with
15 her and giving her advice that she asked for.
16 The reason being is because I have done other
17 deals like this so I tried to help her in any
18 way, shape or form that I could so she wasn't
19 taken advantage of. If I had any advice for her
20 being she is my significant other, just as you
21 would, I gave it to her.

22 MR. KRIEGSMAN: I'm going
23 to mark as Exhibit A the Amended
24 Complaint in this case.

25 (Plaintiff's Exhibit A,

1 R. Pilla

2 Amended Complaint, was marked for
3 identification, as of this date.)

4 Q Mr. Pilla, I'm showing you a
5 document that has been marked as Exhibit A for
6 this deposition. This is the Amended Complaint
7 in this action that was filed on April 1, 2021.
8 I'm going to scroll through that slowly. Please
9 let me know if you want me to speed up, slow
10 down or go back.

11 MR. SKIBELL: Do you want
12 to get some context as to what you
13 are asking about? You are
14 scrolling too fast.

15 Q Is it too fast, Mr. Pilla?

16 MR. SKIBELL: If you want
17 him to read the entire thing, you
18 need to go slow. Is that what you
19 want, Alex?

20 MR. KRIEGSMAN: Reid, when
21 I'm interested in your advice, I
22 will let you know about it.

23 MR. SKIBELL: You can't
24 scroll through like you are doing,
25 Alex, and ask my client questions.

1 R. Pilla

2 A I don't know much about it.

3 Q Did you have any involvement in
4 this relationship other than bringing coffee to
5 the table and giving advice?

6 A No, I didn't.

7 Q Did you have any relationship with
8 Shoreline?

9 A Never.

10 Q Any involvement with Shoreline at
11 all?

12 A Never.

13 Q Other than bringing coffee to the
14 table and providing advice, did you ever have
15 any contact or communications or negotiations
16 with Shoreline?

17 A Mr. Kriegsman, if you want to ask
18 a direct question, I can answer you. It seems
19 you are being very vague in the way of asking me
20 a question. I read the Complaint. I read the
21 Interrogatories. I read the information that
22 has been produced. If you want to ask me a
23 question about it, feel free to ask and I will
24 answer it for you.

25 MR. KRIEGSMAN: Susan, can

1 R. Pilla

2 you read back the last question,
3 please.

4 (The requested portion of
5 the record was read by the Court
6 Reporter.)

7 MR. SKIBELL: Objection,
8 vague. You can answer if you
9 understand the question.

10 Q Did you understand the question,
11 Mr. Pilla?

12 A No, I don't understand the
13 question. If you want to rephrase it, I can try
14 to answer it for you.

15 Q Sure. Let's try to break it up.
16 You testified earlier that you brought coffee to
17 the table and provided advice to Ms. Herbst,
18 correct?

19 A Correct.

20 Q Did you ever have any contact with
21 Shoreline Aviation?

22 MR. SKIBELL: Objection.

23 A The only contact I have had with
24 Shoreline Aviation, and that is a broad
25 statement, was simply I have had from time to

1 R. Pilla

2 time communications with John Kelly which was
3 presented in your evidence. That's what I'm
4 referring to.

5 Q Any other contact with Shoreline?

6 A No.

7 Q Did you ever negotiate with
8 Shoreline?

9 A (Nodding)

10 Q You are shaking your head. You
11 have to give an answer.

12 A No, never negotiated with
13 Shoreline.

14 Q You mentioned from time to time
15 you had communications with John Kelly; what
16 were those?

17 A They were during the time that
18 they were trying to join forces with Blade.
19 Cindy was at the time having some surgical
20 procedures and having some medical procedures
21 and also taking her daughter to colleges and
22 stuff, so from time to time she was unavailable.

23 So there was some small text
24 messages back and forth between John Kelly and
25 myself trying to set up a meeting so everyone

1 R. Pilla

2 could join forces instead of compete against
3 each other. Because in my opinion, my advice at
4 the time was that why not join forces and work
5 together instead of competing against each
6 other.

7 Q When you say everyone, who do you
8 mean by that?

9 A Blade, Rob Wiesenthal, Melissa
10 Tomkiel, and Cindy, SAFE.

11 Q When you use the phrase
12 "everyone," does that include Shoreline in that?

13 A Yes, Shoreline, John Kelly.

14 Q When you said everyone should join
15 forces, you meant Blade, Wiesenthal, Tomkiel on
16 the one hand, Cindy, SAFE, and Sound on the
17 other hand, and Shoreline John Kelly; is that
18 who you are referring to?

19 A Yes.

20 Q Anyone else or any other entity?

21 A No.

22 Q What did you mean when you said
23 "join forces"?

24 A Again, you know, they all did
25 separate things within their company, so at that

1 R. Pilla

2 point in time, it was -- East Hampton Airport is
3 a small airport, and you guys should all work
4 together instead of compete against each other.

5 Q This is happening in the 2018 time
6 frame?

7 A I'm not very good with dates,
8 Mr. Kriegsman, but yes. Again, this is my
9 opinion in the way that it seemed as though
10 everyone could work better together instead of
11 against each other. That was my opinion.

12 Q How did you think at that time the
13 parties were working against each other?

14 MR. SKIBELL: Objection.

15 A I don't understand the question.
16 They all brought something to the table; you
17 know, you should all work together. I wasn't
18 involved in any of that. I just knew that from
19 a business component when there's a big gorilla
20 in the room and smaller little ones, maybe it is
21 easier for everyone to join each other and
22 become one.

23 Q Who was the gorilla in the room?

24 A I don't know. I'm just saying if
25 there was. I'm simply saying why work against

1 R. Pilla

2 each other, you can all work together. Again
3 it's a small airport. There's only one --

4 Q I'm sorry, I didn't mean to
5 interrupt you.

6 A It is a very small community, the
7 aviation community at East Hampton Airport.

8 Q When you use the phrase "gorilla
9 in the room," were you referring to Blade?

10 A I was referring to whoever was the
11 powerful one there, they should all join
12 together with whoever it was.

13 Q Okay, but I'm asking --

14 A Cindy has been there the longest.
15 She has been there over 35 years.

16 Q Were you referring to Cindy as the
17 gorilla in the room?

18 MR. SKIBELL: Objection.

19 A No, I wasn't referring to anyone
20 as the gorilla.

21 Q Amongst those parties that you
22 identified; Blade, Cindy, SAFE, Shoreline, John
23 Kelly, if one of those would be the gorilla in
24 the room, who would that be?

25 MR. SKIBELL: Objection;

1 R. Pilla

2 asked and answered. You can
3 answer it again.

4 A Everyone did something different.
5 There were helicopters, there's seaplanes,
6 there's Cindy's charter planes. Everyone did
7 something, again so -- I don't know who was more
8 powerful than the other.

9 Q When you used the phrase "gorilla
10 in the room," you weren't referring to Blade?

11 A What's that?

12 MR. SKIBELL: Objection;
13 asked and answered.

14 Q Did you think there was a time
15 where Blade or Cindy or Shoreline were working
16 against each other?

17 A No, I just think they had their
18 own separate entity, whatever they did. There
19 was no reason for them to compete against each
20 other is what I was saying.

21 Q To your knowledge, were there
22 negotiations by and amongst Blade and Shoreline
23 and Cindy?

24 A Ask the question again.

25 Q Were you aware of negotiations to

1 R. Pilla

2 work together between Blade, the Blade parties,
3 Cindy, SAFE, and Shoreline?

4 A Yes, I was aware of it. I was not
5 part of the negotiations, I was aware of it.

6 Q How did you come to be aware of
7 it?

8 A Through conversations with Cindy.

9 Q Any conversations with Shoreline?

10 A No. Like I already stated, I had
11 minimum conversations with John Kelly trying to
12 just set up a meeting for everyone to meet and
13 discuss this.

14 Q Through your personal relationship
15 with Cindy you became aware of negotiations
16 between Cindy, Shoreline, and Blade?

17 A Yes.

18 Q Did you participate in the
19 negotiations?

20 A I did not participate in any
21 negotiations.

22 Q You never negotiated with
23 Shoreline on Cindy's behalf?

24 A No.

25 Q You never negotiated with Blade on

1 R. Pilla

2 Cindy's behalf?

3 A I simply had a conversation. I
4 had spoken to John Kelly via text like I said to
5 you. And from time to time being that I was
6 around the airport, I would have small talk with
7 Rob Wiesenthal, both of them, just trying to get
8 Cindy and Rob Wiesenthal to speak about this to
9 try to better Cindy's life as -- like I stated
10 already, I'm trying to get her to work less.

11 Q What was the nature of the small
12 talk?

13 A Oh, nothing. It was just a
14 conversation that Rob Wiesenthal needed to get
15 in touch with Cindy to know the ins and outs of
16 her business which I don't know.

17 Q You suggested to Rob Wiesenthal
18 that he get in touch with Cindy to learn the ins
19 and outs of her business?

20 A No, that's not what I said. I
21 said Rob Wiesenthal asked from time to time, "Is
22 Cindy around? Can you get Cindy in touch with
23 me," for conversation between Rob Wiesenthal and
24 Cindy, not between Rob Wiesenthal and me.

25 Q Any other involvement?

1 R. Pilla

2 A No other involvement.

3 Q No other involvement in
4 negotiations between Cindy on one hand and Blade
5 on the other hand?

6 A No, besides the conversations
7 between Cindy and I, and advice that she would
8 ask me being that I was her boyfriend. That's
9 it.

10 Q Did you ever try to get Shoreline
11 thrown out of the East Hampton Airport?

12 A Never.

13 Q Do you know who Jim Brundidge is?

14 A Yes.

15 Q Who is he?

16 A The manager at the East Hampton
17 Airport.

18 Q Did you ever film Shoreline
19 passengers?

20 A No. I took pictures -- and that's
21 very misleading in the way the Complaint was
22 written. And those pictures that were taken of
23 Shoreline had nothing to do with this case
24 whatsoever. This was simply -- those pictures
25 were for a breach that was happening by Cindy's

1 R. Pilla

2 ex-husband when he was facilitating charters
3 behind the counter in the terminal.

4 Q Just to be clear, you never took
5 any videos but you did take some pictures?

6 A I took some pictures and it wasn't
7 of Shoreline's -- it wasn't of passengers. It
8 wasn't any of that. It was simply of the
9 ex-husband that was facilitating -- that's why
10 when you read this Complaint, it is very
11 misleading.

12 That was simply pictures that were
13 taken of the ex-husband facilitating charters
14 behind the East Hampton terminal counter which
15 he was not allowed to do. It was a breach of
16 Cindy's and her ex-husband's marital
17 stipulation.

18 MR. SKIBELL: I would like
19 to take a break before you ask
20 your next question.

21 Q So you didn't take any video,
22 correct?

23 A No. I took pictures.

24 MR. KRIEGSMAN: Let's take
25 that break. How much time would

1 R. Pilla

2 World.

3 Q Can you list the five businesses
4 that you were referring to?

5 A It wasn't five. It was four that
6 I just mentioned and that was The Car Doctor,
7 Car Doctor, Car Doctor World, Car Doctor Motor
8 Sports.

9 Q Car Doctor, The Car Doctor, Car
10 Doctor World, and Car Doctor Motor Sports?

11 A Correct.

12 Q You said five, but it's four; is
13 that fair to say?

14 A Yes.

15 Q You refer to them as subsidiary
16 companies; are those separate legal entities?

17 A Car Doctor Motor Sports is and The
18 Car Doctor.

19 Q Have any of those entities been
20 part of lawsuits?

21 MR. SKIBELL: Objection;
22 asked and answered.

23 A Not that I recall. No, they
24 haven't. Not that I recall, no.

25 Q You end this text message by

1 R. Pilla

2 saying, "I'm doing the best I can my friend."

3 What did you mean by that?

4 A It's the way I talk to people, my
5 friend, whatever. It could be anything.

6 Q Was John Kelly a friend of yours?

7 A No.

8 Q How did you know him?

9 A Just through Cindy.

10 Q Did you have any animosity towards
11 him?

12 A Nope.

13 Q Did you feel that he had wronged
14 you in any way?

15 A No.

16 Q In April of 2018 did you know that
17 he was sick?

18 A Yeah. I don't know the dates but
19 I heard that he was sick. I don't know the
20 dates. I knew that he was obviously.

21 Q Obviously what?

22 A I don't know the dates. I don't
23 know what he was sick with or anything to do
24 with that as far as what --

25 Q What was obvious to you?

1 R. Pilla

2 A I'm sorry?

3 Q What was obvious to you?

4 A I didn't know the dates. I don't
5 know the dates of when he was sick.

6 Q But you used the word obvious.
7 I'm trying to understand what you meant. What
8 was obvious to you?

9 A I didn't mean anything by it.

10 Q Was it obvious to you that John
11 Kelly was dying of cancer?

12 A No. I didn't know the date is
13 what I was referring to. I don't know the date
14 of when he was sick or anything to do with that.

15 Q I'm not asking you about the date.
16 You testified that you heard that he was sick,
17 correct?

18 A Yes.

19 Q As we sit here today, you know
20 John Kelly eventually died of cancer, correct?

21 A Yes, I do.

22 Q Before he died there came a time
23 that you heard that he was sick, correct?

24 A Right. I don't recall who I heard
25 it from. I probably heard it from Cindy but I

1 R. Pilla

2 don't know what the time frame was. I was not
3 involved in any of the business that happened
4 here so I don't know.

5 Q When you say you were not involved
6 in any of the business that happened here, you
7 are referring to what's alleged in the lawsuit?

8 A The everyday business that went
9 on, correct. I had nothing to do with Cindy and
10 SAFE's business.

11 Q Did there come a time where you
12 saw John Kelly and it appeared that he was sick?

13 A No.

14 MR. KRIEGSMAN: Let's just
15 take a short break here. Ten
16 minutes if that's okay with you.
17 Let's go on a 10-minute break.

18 (Recess was taken)

19 MR. KRIEGSMAN: Back on the
20 record.

21 Q Mr. Pilla, are you ready?

22 A Yes.

23 Q Mr. Skibell is your attorney in
24 this lawsuit?

25 A Yes.

1 R. Pilla

2 Q When the lawsuit was filed
3 however, you were represented by a different
4 attorney, correct?

5 A I don't know how to answer that
6 honestly. You can correct me because I don't
7 think I was part of the case at that point in
8 time.

9 Q Just to be clear, I don't want you
10 to reveal the substance of any communications
11 you may have had with Mr. Skibell or your
12 previous attorney, but I'm just going to share
13 the screen.

14 MR. KRIEGSMAN: I'm going
15 to mark as Exhibit C to the
16 deposition a June 26, 2020, letter
17 to the Honorable John Azrack from
18 Frederic C. Foster, PC.

19 (Plaintiff's Exhibit C,
20 June 26, 2020, letter from
21 Frederic C. Foster, was marked for
22 identification, as of this date.)

23 Q Does that refresh your
24 recollection, Mr. Pilla, that before Mr. Skibell
25 you had a different attorney representing you in